

Kenneth A. Goldberg, Esq. (KG 0295)
GOLDBERG & FLIEGEL LLP
60 East 42nd Street, Suite 3421
New York, New York 10165
(212) 983-1077
Attorneys For Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
CLAUDIA WOODARD AND ELISE
LAWLESS,

Plaintiffs,

- against -

TWC MEDIA SOLUTIONS, INC. and
THE WEATHER CHANNEL,

Defendants

:
: 09 CIV. 3000

:
: **CERTIFICATION OF PLAINTIFFS'**
: **COUNSEL KENNETH A. GOLDBERG IN**
: **OPPOSITION TO DEFENDANTS'**
: **MOTION FOR SUMMARY JUDGMENT**
:
: x

I, KENNETH A. GOLDBERG, of full age, hereby certify and say:

1. I am counsel for Plaintiffs in the above-captioned matter. I make this certification in opposition to Defendants' pending motion for summary judgment in the above matter.

2. Attached hereto as Exhibit A is a true and correct copy of the First Amended Complaint (and copies of the first page of same showing it was marked as a deposition exhibit).

3. Attached hereto as Exhibit B is a true and correct copy of the Answer.

4. Attached hereto as Exhibit C is a copy of the transcript of the deposition of Lisa Chang.

5. Attached hereto as Exhibit D is a copy of the transcript of the deposition of Mark Gall.

6. Attached hereto as Exhibit E is a copy of the transcript of the deposition of Liz Janneman.
7. Attached hereto as Exhibit F is a copy of the transcript of the deposition of Catherine Jolly.
8. Attached hereto as Exhibit G is a copy of the transcript of the deposition of Richard Klein.
9. Attached hereto as Exhibit H is a copy of the transcript of the deposition of Elise Lawless.
10. Attached hereto as Exhibit I is a copy of the transcript of the deposition of Lisa Longo.
11. Attached hereto as Exhibit J is a copy of the transcript of the deposition of Rick Monihan.
12. Attached hereto as Exhibit K is a copy of the transcript of the deposition of Jen Monson.
13. Attached hereto as Exhibit L is a copy of the transcript of the deposition of Mary Jo Romeo.
14. Attached hereto as Exhibit M is a copy of the transcript of the deposition of Pam Sawyer.
15. Attached hereto as Exhibit N is a copy of the transcript of the deposition of Terry Sekel.
16. Attached hereto as Exhibit O is a copy of the transcript of the deposition of Claudia Woodard.

17. Attached hereto as Exhibit P are copies of Plaintiffs' deposition exhibits cited in Plaintiffs' opposition papers. The exhibits are sequential and numbered.

18. Attached hereto as Exhibit Q are copies of Defendants' Woodard deposition exhibits cited in Plaintiffs' opposition papers. The exhibits are sequential and numbered.

19. Attached hereto as Exhibit R are copies of Defendants' Lawless deposition exhibits cited in Plaintiffs' opposition papers. The exhibits are sequential and numbered.

20. Attached hereto as Exhibit S are copies of Monihan deposition exhibits cited in Plaintiffs' opposition papers. The exhibits are sequential and numbered.

21. Attached hereto as Exhibit T are copies of Monson deposition exhibits cited in Plaintiffs' opposition papers. The exhibits are sequential and numbered.

22. Attached hereto as Exhibit U is a copy of the EEOC's Determination and Notice of Right to Sue regarding Claudia Woodard's EEOC Charge.

23. Attached hereto as Exhibit V is a copy of the EEOC's Determination and Notice of Right to Sue regarding Elise Lawless's EEOC Charge.

24. Attached hereto as Exhibit W is a copy of the Affidavit of Will Tague.

25. Attached hereto as Exhibit X is a copy of the Affidavit of Meeana Bhiri.

26. Attached hereto as Exhibit Y is a copy of the Affidavit of Peggy Grundt.

27. Attached hereto as Exhibit Z is a copy of the Affidavit of Courtney Kurland.

28. Attached hereto as Exhibit AA is a copy of a document stamped with Bates Number CW0078.

29. Attached hereto as Exhibit BB is a copy of a document stamped with Bates Number TWC1467.

30. Attached hereto as Exhibit CC is a copy of a document stamped with Bates Number CW0996.

31. Attached hereto as Exhibit DD is a copy of documents stamped with Bates Numbers CW0389-90.

32. Attached hereto as Exhibit EE is a copy of a document stamped with Bates Number TWC2996.

33. Attached hereto as Exhibit FF is a copy of documents stamped with Bates Numbers TWC1390-2.

34. Attached hereto as Exhibit GG is a copy of a document stamped with Bates Number CW0382.

35. Attached hereto as Exhibit HH is a copy of documents stamped with Bates Numbers CW0211-0212.

36. Attached hereto as Exhibit II is a copy of a document stamped with Bates Number CW0250.

37. Attached hereto as Exhibit JJ is a copy of a document stamped with Bates Number TWC1789.

38. Attached hereto as Exhibit KK is a copy of documents stamped with Bates Numbers TWC2518-22.

39. Attached hereto as Exhibit LL is a copy of a document stamped with Bates Number TWC1777.

40. Attached hereto as Exhibit MM is a copy of documents stamped with Bates Numbers TWC2172-6.

41. Attached hereto as Exhibit NN is a copy of documents stamped with Bates Numbers TWC1844-5.

42. Attached hereto as Exhibit OO is a copy of documents stamped with Bates Numbers TWC2159-63.

43. Attached hereto as Exhibit PP is a copy of Plaintiffs' errata sheets to their deposition transcripts with a copy of Defendants' response to same.

44. Certain documents attached to this certification have been redacted based on the Court's instructions regarding redacting information from documents filed with the Court.

Dated: New York, New York
December 1, 2009

GOLDBERG & FLIEGEL LLP

By: /s/ Kenneth A. Goldberg
Kenneth A. Goldberg (KG 0295)
60 East 42nd Street, Suite 3421
New York, New York 10165
(212) 983-1077
Attorneys for Plaintiffs